

Data Submission

DCI Number: GDCI-083301-1554

Data Call-In Information

Company Name	ARCH CHEMICALS, INC.
Company Address	1200 BLUEGRASS LAKES PARKWAY ALPHARETTA, GA 30004
DCI Type	Generic
Issued Date	05/06/2016
90-Day Response Deadline	08/14/2016
CRM Information	opp_ad_reevaluation_DCI_team@epa.gov
Chemical Name	Hexahydro-1,3,5-tris(2-hydroxyethyl)-s-triazine
Chemical Number	083301

Data Submission Information

Tracking Number	CDX_DCI_2016_000192
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DCI Level Documents

File Name	File Type	MRID	CBI	Submitted Date
DCI HTH Cover Letter GDCI Response 083301-1554 2016-07-19.pdf	Submission Cover Letter	N.A.	N	07/21/2016

EPA Product Registration Number(s)

1258-1248	I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.
Source EPA Registration Number(s)	

EPA Product Registration Documents: 1258-1248

File Name	File Type	MRID	CBI	Submitted Date
CSF 1258-1248 Proxel TN 2016-07-14.pdf	Form 8570-4 Confidential Statement of Formula	N.A.	Y	07/22/2016

1258-990	I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.
Source EPA Registration Number(s)	

EPA Product Registration Documents: 1258-990

File Name	File Type	MRID	CBI	Submitted Date
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Product ingredient source information may be entitled to confidential treatment

CSF 1258-990 Triadine 10 Basic 2016-07-14.pdf	Form 8570-4 Confidential Statement of Formula	N.A.	Y	07/22/2016
1258-1205	I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.			
Source EPA Registration Number(s)				
EPA Product Registration Documents: 1258-1205				
File Name	File Type	MRID	CBI	Submitted Date
CSF 1258-1205 Triadine 20 Basic 2016-07-14.pdf	Form 8570-4 Confidential Statement of Formula	N.A.	Y	07/22/2016
1258-1071	I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.			
Source EPA Registration Number(s)				
EPA Product Registration Documents: 1258-1071				
File Name	File Type	MRID	CBI	Submitted Date
CSF 1258-1071 Triadine 3 Basic 2016-07-14.pdf	Form 8570-4 Confidential Statement of Formula	N.A.	Y	07/22/2016
Guideline Requirement Number(s)				
Guideline Requirement Number - 835.1110				
Study Title	Activated sludge sorption isotherm			
Protocol	N			
Target Submission Date	05/06/2017			
Use Pattern	Y; Z; X			
Test Substance	COMMENT			
Time Frame	12 month(s)			
Footnote(s)	<p>5. Parent TGA and degradate: 1,3,5-trimethyl triazine.</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p> <p>11. EPA has a published final guideline for this study: http://www.regulations.gov/#/documentDetail;D=EPA-HQ-OPPT-2009-0152-0003.</p>			
Registrant Response	N.A.			
Guideline Requirement Number - 835.1230				
Study Title	Sediment and soil absorption/desorption for parent and degradates			

Protocol	N
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	COMMENT
Time Frame	12 month(s)
Footnote(s)	5. Parent TGA and degradate: 1,3,5-trimethyl triazine. 8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.
Registrant Response	N.A.

Guideline Requirement Number - 835.2120

Study Title	Hydrolysis of parent and degradates as a function of pH at 25 C
Protocol	N
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	COMMENT
Time Frame	12 month(s)
Footnote(s)	8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate. 5. Parent TGA and degradate: 1,3,5-trimethyl triazine.
Registrant Response	N.A.

Guideline Requirement Number - 835.3110

Study Title	Ready biodegradability
Protocol	N
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	COMMENT
Time Frame	12 month(s)

Footnote(s)	<p>1. The results of the Activated Sludge, Respiration Inhibition Test (ASRI), GLN 850.3300, will determine which of the four biodegradation tests are required. *If the ASRI test results in an EC50 of less than or equal to 20 mg/L, then either the (i) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, GLN 835.3280, (ii) the Simulation Test *Aerobic Sewage Treatment -*A. Activated Sludge Units, GLN 835.3240, or (iii) the Porous Pot Test, GLN 835.3220 is required. *If the ASRI test results in an EC50 greater than 20 mg/L, then the registrant is required to conduct either the (i) Ready Biodegradability, GLN 835.3110, (ii) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, (iii) the Simulation Test *Aerobic Sewage Treatment *A. Activated Sludge Units, or (iv) the Porous Pot Test. *If the Ready Biodegradability Study is conducted and passes, then no further testing is required. If, however, the pesticide fails the Ready Biodegradability study, then the (i) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, (ii) the Simulation Test *Aerobic Sewage Treatment *A. Activated Sludge Units, or (iii) the Porous Pot Test is required.</p> <p>5. Parent TGA1 and degradate: 1,3,5-trimethyl triazine.</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p>
Registrant Response	N.A.
Guideline Requirement Number - 835.3220	
Study Title	Porous pot test
Protocol	N
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	COMMENT
Time Frame	12 month(s)
Footnote(s)	<p>1. The results of the Activated Sludge, Respiration Inhibition Test (ASRI), GLN 850.3300, will determine which of the four biodegradation tests are required. *If the ASRI test results in an EC50 of less than or equal to 20 mg/L, then either the (i) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, GLN 835.3280, (ii) the Simulation Test *Aerobic Sewage Treatment -*A. Activated Sludge Units, GLN 835.3240, or (iii) the Porous Pot Test, GLN 835.3220 is required. *If the ASRI test results in an EC50 greater than 20 mg/L, then the registrant is required to conduct either the (i) Ready Biodegradability, GLN 835.3110, (ii) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, (iii) the Simulation Test *Aerobic Sewage Treatment *A. Activated Sludge Units, or (iv) the Porous Pot Test. *If the Ready Biodegradability Study is conducted and passes, then no further testing is required. If, however, the pesticide fails the Ready Biodegradability study, then the (i) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, (ii) the Simulation Test *Aerobic Sewage Treatment *A. Activated Sludge Units, or (iii) the Porous Pot Test is required.</p> <p>5. Parent TGA1 and degradate: 1,3,5-trimethyl triazine.</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p>
Registrant Response	N.A.
Guideline Requirement Number - 835.3240	
Study Title	Simulation Test-Aerobic Sewage Treatment-Activated Sludge
Protocol	N

Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	COMMENT
Time Frame	12 month(s)
Footnote(s)	<p>1. The results of the Activated Sludge, Respiration Inhibition Test (ASRI), GLN 850.3300, will determine which of the four biodegradation tests are required. *If the ASRI test results in an EC50 of less than or equal to 20 mg/L, then either the (i) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, GLN 835.3280, (ii) the Simulation Test *Aerobic Sewage Treatment -*A. Activated Sludge Units, GLN 835.3240, or (iii) the Porous Pot Test, GLN 835.3220 is required. *If the ASRI test results in an EC50 greater than 20 mg/L, then the registrant is required to conduct either the (i) Ready Biodegradability, GLN 835.3110, (ii) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, (iii) the Simulation Test *Aerobic Sewage Treatment *A. Activated Sludge Units, or (iv) the Porous Pot Test. *If the Ready Biodegradability Study is conducted and passes, then no further testing is required. If, however, the pesticide fails the Ready Biodegradability study, then the (i) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, (ii) the Simulation Test *Aerobic Sewage Treatment *A. Activated Sludge Units, or (iii) the Porous Pot Test is required.</p> <p>5. Parent TGA1 and degradate: 1,3,5-trimethyl triazine.</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p>
Registrant Response	N.A.
Guideline Requirement Number - 835.3280	
Study Title	Simulation Tests to Assess the Biodegradability of Chemicals
Protocol	N
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	COMMENT
Time Frame	12 month(s)
Footnote(s)	<p>1. The results of the Activated Sludge, Respiration Inhibition Test (ASRI), GLN 850.3300, will determine which of the four biodegradation tests are required. *If the ASRI test results in an EC50 of less than or equal to 20 mg/L, then either the (i) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, GLN 835.3280, (ii) the Simulation Test *Aerobic Sewage Treatment -*A. Activated Sludge Units, GLN 835.3240, or (iii) the Porous Pot Test, GLN 835.3220 is required. *If the ASRI test results in an EC50 greater than 20 mg/L, then the registrant is required to conduct either the (i) Ready Biodegradability, GLN 835.3110, (ii) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, (iii) the Simulation Test *Aerobic Sewage Treatment *A. Activated Sludge Units, or (iv) the Porous Pot Test. *If the Ready Biodegradability Study is conducted and passes, then no further testing is required. If, however, the pesticide fails the Ready Biodegradability study, then the (i) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, (ii) the Simulation Test *Aerobic Sewage Treatment *A. Activated Sludge Units, or (iii) the Porous Pot Test is required.</p> <p>5. Parent TGA1 and degradate: 1,3,5-trimethyl triazine.</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p>

Registrant Response	N.A.
Guideline Requirement Number - 835.4300	
Study Title	Aerobic aquatic metabolism
Protocol	N
Target Submission Date	05/06/2018
Use Pattern	Y; Z; X
Test Substance	COMMENT
Time Frame	24 month(s)
Footnote(s)	<p>5. Parent TGA I and degradate: 1,3,5-trimethyl triazine.</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p>
Registrant Response	N.A.
Guideline Requirement Number - 850.1300	
Study Title	Daphnid chronic toxicity test
Protocol	N
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	TGA I
Time Frame	12 month(s)
Footnote(s)	<p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p>
Registrant Response	N.A.
Guideline Requirement Number - 850.1400	
Study Title	Fish early-life stage toxicity test
Protocol	N
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	TGA I
Time Frame	12 month(s)

Footnote(s)	8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.
Registrant Response	N.A.
Guideline Requirement Number - 850.3300	
Study Title	Modified Activated Sludge, Respiration Inhibition Test
Protocol	N
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	COMMENT
Time Frame	12 month(s)
Footnote(s)	<p>5. Parent TGAi and degradate: 1,3,5-trimethyl triazine.</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p> <p>10. EPA published draft guidance under guideline 850.6800 and has since published final guidance for this study under guideline 850.3300: http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPPT-2009-0154-0021. OECD Test Guideline 209 can also be used as guidance for this study, available online at http://www.oecd-ilibrary.org/content/book/9789264070080-en.</p>
Registrant Response	N.A.
Guideline Requirement Number - 850.4400	
Study Title	Aquatic Plant Toxicity Using Lemna spp
Protocol	N
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	TGAi
Time Frame	12 month(s)
Footnote(s)	8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.
Registrant Response	N.A.
Guideline Requirement Number - 850.4500	
Study Title	Algal Toxicity
Protocol	N
Target Submission Date	05/06/2017

Use Pattern	Y; Z; X
Test Substance	TGAI
Time Frame	12 month(s)
Footnote(s)	<p>7. On June 27, 2012, EPA announced certain revisions in harmonized guideline series 850 * Ecological Effects Tests * including renumbering and other designations or changes for some guideline studies. See *Final Test Guidelines; OCSPP 850 Series; Notice of Availability* 77 FR 38282, June 27, 2012. http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPPT-2009-0154-0028</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p>
Registrant Response	N.A.
Guideline Requirement Number - 850.4550	
Study Title	Cyanobacteria (Anabaena flos-aquae) Toxicity
Protocol	N
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	TGAI
Time Frame	12 month(s)
Footnote(s)	<p>7. On June 27, 2012, EPA announced certain revisions in harmonized guideline series 850 * Ecological Effects Tests * including renumbering and other designations or changes for some guideline studies. See *Final Test Guidelines; OCSPP 850 Series; Notice of Availability* 77 FR 38282, June 27, 2012. http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPPT-2009-0154-0028</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p>
Registrant Response	N.A.
Guideline Requirement Number - 870.6200	
Study Title	Neurotoxicity screening battery
Protocol	Y
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	TGAI
Time Frame	12 month(s)

Footnote(s)	<p>6. Only Acute (study due 12 months after receipt of DCI) neurotoxicity study is required.</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p> <p>14. A protocol must be submitted to the agency prior to conducting the study.</p>
Registrant Response	N.A.
Guideline Requirement Number - 870.7485	
Study Title	Metabolism and pharmacokinetics
Protocol	N
Target Submission Date	05/06/2018
Use Pattern	Y; Z; X
Test Substance	PAIRA
Time Frame	24 month(s)
Footnote(s)	<p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p>
Registrant Response	N.A.
Guideline Requirement Number - 870.7800	
Study Title	Immunotoxicity
Protocol	N
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	TGAI
Time Frame	12 month(s)
Footnote(s)	<p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p>
Registrant Response	N.A.
Guideline Requirement Number - 875.1200	
Study Title	Dermal exposure--Indoor
Protocol	Y
Target Submission Date	05/06/2018
Use Pattern	Y; Z; X
Test Substance	TEP

Time Frame	24 month(s)
Footnote(s)	<p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p> <p>12. Data required on exposure scenarios: Machinist, Brush/Roller, Airless Sprayer, Mop, Spray and Wipe, Liquid Pour, and Solid Pour WP.</p> <p>14. A protocol must be submitted to the agency prior to conducting the study.</p>
Registrant Response	N.A.
Guideline Requirement Number - 875.1400	
Study Title	Inhalation exposure--indoor
Protocol	Y
Target Submission Date	05/06/2018
Use Pattern	Y; Z; X
Test Substance	COMMENT
Time Frame	24 month(s)
Footnote(s)	<p>2. TEP and degradate: formaldehyde.</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p> <p>12. Data required on exposure scenarios: Machinist, Brush/Roller, Airless Sprayer, Mop, Spray and Wipe, Liquid Pour, and Solid Pour WP.</p> <p>14. A protocol must be submitted to the agency prior to conducting the study.</p>
Registrant Response	N.A.
Guideline Requirement Number - 875.1700	
Study Title	Product Use Information
Protocol	N
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	TEP
Time Frame	12 month(s)
Footnote(s)	<p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p>
Registrant Response	N.A.
Guideline Requirement Number - 875.2400	
Study Title	Dermal exposure

Protocol	Y
Target Submission Date	05/06/2018
Use Pattern	Y; Z; X
Test Substance	TEP
Time Frame	24 month(s)
Footnote(s)	<p>3. Required for manufacturing settings of material preservatives uses only.</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p> <p>14. A protocol must be submitted to the agency prior to conducting the study.</p>
Registrant Response	N.A.
Guideline Requirement Number - 875.2500	
Study Title	Inhalation exposure
Protocol	Y
Target Submission Date	05/06/2018
Use Pattern	Y; Z; X
Test Substance	COMMENT
Time Frame	24 month(s)
Footnote(s)	<p>2. TEP and degradate: formaldehyde.</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p> <p>9. Formaldehyde inhalation exposures are expected to occur to as a result of HHT material preservative (household cleaner, paint, detergent, and oil field) application. Currently, no data are available to assess these exposures, and therefore, monitoring data are needed.</p> <p>14. A protocol must be submitted to the agency prior to conducting the study.</p>
Registrant Response	N.A.
Guideline Requirement Number - SS-1218	
Study Title	Nature of Residue on Surfaces
Protocol	Y
Target Submission Date	05/06/2018
Use Pattern	Y; Z; X
Test Substance	TGAI
Time Frame	24 month(s)

Footnote(s)	<p>4. Required for hard surface cleaner and dish detergent material preservative uses only.</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p> <p>14. A protocol must be submitted to the agency prior to conducting the study.</p>
Registrant Response	N.A.
Guideline Requirement Number - SS-Migration	
Study Title	Migration studies
Protocol	Y
Target Submission Date	05/06/2017
Use Pattern	Y; Z; X
Test Substance	TEP
Time Frame	12 month(s)
Footnote(s)	<p>4. Required for hard surface cleaner and dish detergent material preservative uses only.</p> <p>8. Information on the degradate 1,3,5-trimethyl triazine which remains after the release of formaldehyde may potentially be available from information on other triazines. The registrants could propose triazine data and bridging information if appropriate in lieu of guideline studies on the degradate.</p> <p>13. Based on the results of the nature of the residue on surfaces study, if residues of concern are identified, then migration studies are required and protocols must be approved by the Agency prior to the initiation of the study.</p> <p>14. A protocol must be submitted to the agency prior to conducting the study.</p>
Registrant Response	N.A.
Submitter Information	
Submitter	Diane Fullam
Submitted Date	07/21/2016